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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	
MEECHAM HOSPITALITY, LLC,	§	CASE NO: 12-40594-RFN-11
	§	
Debtor	§	CHAPTER 11

RESPONSE TO MOTION TO LIFT THE AUTOMATIC STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Meecham Hospitality, LLC, Debtor in the above styled and numbered bankruptcy proceeding and files this its response to City Bank, Texas's (the "Movant") Motion to Lift the Automatic Stay (the "Motion") and would respectfully show the Court as follows:

SPECIFIC ADMISSIONS

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor cannot admit or deny the allegations contained in paragraph 2 of the Motion, as the documents speak for themselves.
3. Debtor admits the allegations contained in the first sentence of paragraph 3 of the Motion. Debtor cannot admit or deny the allegations contained in the second sentence of paragraph 3 of the Motion, as the documents speak for themselves.
4. Debtor admits the allegations contained in paragraph 4 of the Motion.
5. Debtor admits the allegations contained in paragraph 5 of the Motion.

6. Debtor admits the allegations contained in paragraph 6(a) of the Motion.
7. Debtor admits the allegations contained in paragraph 6(b) of the Motion.
8. Debtor cannot admit or deny the allegations contained in paragraph 6(c) of the Motion, as the documents speak for themselves.
9. Debtor cannot admit or deny the allegations contained in paragraph 6(d) of the Motion, as it does not know if the value will increase or decrease.
10. Debtor denies the allegations contained in paragraph 6(e) of the Motion, as the Debtor is contributing an additional \$600,000.00 by waiving the management fee.
11. Debtor admits the allegations contained in paragraph 7 of the Motion.
12. Debtor denies the allegations contained in paragraph 8 of the Motion.
13. Debtor denies the allegations contained in paragraph 9 of the Motion.
14. Debtor denies the allegations contained in paragraph 10 of the Motion.
15. Debtor denies the allegations contained in paragraph 11 of the Motion.
16. Debtor denies the allegations contained in paragraph 12 of the Motion.

STATEMENT OF ADEQUATE PROTECTION

17. The Property is necessary for reorganization.
18. Debtor has made adequate protection payments monthly in the amount of \$35,000.00 plus monthly escrow for taxes in the amount of \$13,000.00 since the filing of the Chapter 11.
19. Debtor has filed a Plan of Reorganization and Disclosure Statement.
20. The Property is insured, and Debtor will maintain insurance on the Property.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that the Court deny the Motion and relief requested and grant the Debtor such other and further relief to which it may show itself entitled.

Dated: June 13, 2012

Respectfully Submitted,

/s/ Arthur I. Ungerman
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 13, 2012 a true and correct copy of the foregoing document was forwarded via electronic filing to those persons receiving electronic notice or First Class US Mail to the following:

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/s/ Arthur I. Ungerman
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